Sean K. Claggett
Nevada Bar No. 8407
Joseph N. Mott
Nevada Bar No. 12455
4101 Meadows Lane, Ste. 100
Las Vegas, Nevada 89107
(702) 655-2346 - Telephone
(702) 655-3763 - Facsimile
sclaggett@claggettlaw.com
joey@claggettlaw.com
Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

HEATHER SCHOENWALD, an individual; TOM KOCH, an individual;

Plaintiffs,

v.

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UNUM GROUP, a Foreign Corporation; COLONIAL LIFE & ACCIDENT INSURANCE COMPANY, A SUBSIDIARY OF UNUM GROUP, a Foreign Corporation; DOES 1 through 10; ROE CORPORATIONS, 1 through 10, Defendants Defendants.

Case No.:2:20-CV-01948-JCM-BNW

STIPULATION AND ORDER FOR EXTENSION OF TIME FOR PLAINTIFF SCHOENWALD'S RESPONSE TO DEFENDANTS' PARTIAL DISMISSAL OF PLAINTIFFS' AMENDED COMPLAINT AND DEFENDANTS' REPLY DEADLINES

Plaintiff Heather Schoenwald ("Schoenwald"), Plaintiff Todd Koch ("Koch") (collectively, "Plaintiffs"), Defendant UNUM Group ("UNUM"), and Defendant Colonial Life & Accident Insurance Company ("Colonial Life"), by and through their respective counsel of record, hereby request and stipulate to extend the time for Plaintiff Schoenwald to respond to Defendants' Motion for Partial Dismissal of Plaintiffs' Amended Complaint (Doc. No. 26). Plaintiff Schoenwald's Response is currently due March 9, 2021, and the parties have

<sup>&</sup>lt;sup>1</sup> Defendants did not move to dismiss Plaintiff Koch's single claim for retaliation.

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agreed to extend the time up to and including March 23, 2021. Similarly, Defendants' Reply Brief would be due on March 30, 2021. The parties also agree to extend the deadline for Defendants to file their Reply up to and including April 13, 2021. This is the parties first request for an extension of time for Plaintiff Schoenwald to Respond to Defendants' Motion for partial Dismissal and for Defendants to submit a Reply Brief.

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Case No.:2:20-CV-01948-JCM-BNW
This Stipulation and Proposed Order for Extension of Time is made in
good faith and is not intended for purposes of delay.

DATED this 2nd day of March, 2021. DATED this 2nd day of March, 2021.

CLAGGETT & SYKES LAW FIRM	LAGOMARSINO LAW
/s/ Joseph Mott	/s/ Andre Lagomarsino
Joseph N. Mott	Andre M. Lagomarsino
Nevada Bar No. 12455	Nevada Bar No. 6711
4101 Meadows Lane, Suite 100	Daven P. Cameron
Las Vegas, NV 89107	Nevada Bar No. 14179
Attorneys for Plaintiff Heather	
Schoenwald	Henderson, NV 89052
	Attorneys for Plaintiff Tom Koch
DATED this 2nd day of March, 2021.	
OGLETREE, DEAKINS, NASH, SMOAK &	
STEWART, P.C.	
/s/ Anthony Martin	
Anthony L. Martin	
Nevada Bar No. 8177	
Dana B. Salmonson	
Nevada Bar No. 11180	
3800 Howard Hughes Pkwy., #1500	
Las Vegas, NV 89169	
Attorneys for Defendants UNUM	
Group and Colonial Life & Accident	
Insurance Company	

## **ORDER**

IT IS HEREBY ORDERED that the Parties' Stipulation for Extension of Time Regarding Defendants' Motion for Partial Dismissal of Plaintiffs' Amended Complaint is GRANTED.

UNITED STATES DISTRICT JUDGE

DATED: March 5, 2021